

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	CRIMINAL NO. 04-30033-MAP
	)	
v.	)	
	)	
MARIA SERRAZINA,	)	
	)	
Defendant.	)	
	)	

**GOVERNMENT'S MOTION TO DISMISS ALL COUNTS  
PENDING AGAINST DEFENDANT MARIA SERRAZINA**

The United States of America, by and through Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Steven H. Breslow, Assistant United States Attorney, hereby files this Motion To Dismiss All Counts Pending Against Defendant Maria Serrazina.

1. On July 9, 2004, the Grand Jury returned an Indictment against Maria Serrazina in United States District Court for the District of Massachusetts captioned United States v. Raymond Asselin, Sr., et al., Criminal No. 04-30033-MAP, charging the defendant with, among other things, conspiring to receive gratuities and receipt of gratuities, in violation of 18 U.S.C. §§ 371 and 201, and conspiracy to commit theft against the United States, in violation of 18 U.S.C. §§ 371 and 641. Maria Serrazina was arraigned on the Indictment on July 12, 2004.

2. On January 11, 2005, the Grand Jury returned a Superseding Indictment against Maria Serrazina in United States District Court for the District of Massachusetts captioned United States v. Raymond Asselin, Sr., et al., Criminal No. 04-30033-MAP, charging the defendant with, among other things, the same violations described above. Maria Serrazina was arraigned on the Superseding Indictment on January 19, 2005.

3. On June 20, 2007, the government filed a Pre-Trial Diversion Agreement that, by its terms, was effective as of September 14, 2006. Pursuant to that agreement, the government deferred the defendant's prosecution for a period of eighteen months and agreed to seek dismissal of the indictment with prejudice within thirty days of the diversionary period.

4. By Memorandum dated March 27, 2008, the Pretrial Services Office stated that the defendant fully complied with the conditions of the Pretrial Diversion Program and, accordingly, recommended that the defendant be successfully terminated from the Pretrial Diversion Program.

5. The diversionary period expired on March 14, 2008. The defendant has been subject to pre-trial release conditions during the diversionary period, and has not violated any such condition.

6. Accordingly, the government respectfully requests that the Court dismiss with prejudice all pending counts against the defendant.

Filed this 4th day of April, 2008.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

/s/ Steven H. Breslow  
STEVEN H. BRESLOW  
Assistant United States Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts  
April 4, 2008

I, Steven H. Breslow, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by electronically filing said motion to:

Thomas Lesser, Esq.  
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Counsel for defendant Maria Serrazina

/s/ Steven H. Breslow  
STEVEN H. BRESLOW  
Assistant United States Attorney